

To: Patnode, Angela[patnode.angela@epa.gov]; Ash, Christine[Ash.Christine@epa.gov]; DAgostino, Daniel[DAgostino.Daniel@epa.gov]
From: Rasso, Mark
Sent: Tue 4/17/2018 1:08:51 PM
Subject: RE: Small System Health Based Violations
[Small Systems.xlsx](#)

Regarding the Rads violations, those 109 violations occurred for only 14 systems. When you’re on increased monitoring, you get multiple hits.

From: Patnode, Angela
Sent: Tuesday, April 17, 2018 9:03 AM
To: Rasso, Mark <Rasso.Mark@epa.gov>; Ash, Christine <Ash.Christine@epa.gov>; DAgostino, Daniel <DAgostino.Daniel@epa.gov>
Subject: RE: Small System Health Based Violations

Thanks, Mark. A couple of quick observations:

- NJ doesn’t have any violations for GWR, LTESWTR, or IOCs—this could be theoretically possible, because NY’s numbers are low on these, too. However, NJ also has low numbers on Arsenic and Stage 2 violations when compared to NY, which could be something to look into.
- I’m a little surprised at the relatively high number of Rads violations (second highest category overall for NJ), particularly given that this has a reduced monitoring option similar to that for IOCs/SOCs. I therefore would have expected the number to be as low as in those categories.

Mark, would you mind sending me the data as a whole? In terms of indicators of “failing systems”, it’d be good to try and do an analysis to see how many systems have multiple violations. Depending on what I find, we could classify a system as failing if it has over X violations, for example.

Thanks again!
Best,
Angela

From: Rasso, Mark
Sent: Monday, April 16, 2018 4:02 PM
To: Ash, Christine <Ash.Christine@epa.gov>; Patnode, Angela <patnode.angela@epa.gov>; DAgostino, Daniel <DAgostino.Daniel@epa.gov>
Subject: Small System Health Based Violations

<=10k Popul			
	CWS	NTNCWS	Grand Total
NJ	424	720	1144
NY	2151	727	2878
Grand Total	2575	1447	4022

of Heath Based Rule Violations (2013-Present)

	NJ		NJ Total	NY		NY Total	Grand Total
CWS & NTNCWS (<=10k popul)	CWS	NTNCWS		CWS	NTNCWS		
Arsenic	1	9	10	123	3	126	136
Ground Water Rule				8	4	12	12
Inorganic Chemicals				2	1	3	3
Lead and Copper Rule	15	29	44	20	15	35	79
Long Term 1 Enhanced Surface Water Treatment Rule	10	20	30	31	5	36	66
Long Term 2 Enhanced Surface Water Treatment Rule				7	1	8	8
Nitrates	20	14	34	19	2	21	55
Radionuclides	92	17	109	63		63	172
Revised Total Coliform Rule	5	22	27				27
Stage 1 Disinfectants and Disinfection Byproducts Rule	4	4	8	53	11	64	72
Stage 2 Disinfectants and Disinfection Byproducts Rule	47	5	52	389	41	430	482
Surface Water Treatment Rule	26		26	47	2	49	75
Synthetic Organic Chemicals	4		4	2		2	6
Total Coliform Rule	109	133	242	109	25	134	376
Volatile Organic Chemicals	3	6	9	5	3	8	17
Grand Total	336	259	595	878	113	991	1586